

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	ConocoPhillips Company; Alliance Refinery	AI #:	2418	TEMPO Activity No:	PER20080006
Facility Name:	Unit 294 - LSG	Remarks Submitted by:	Sage Environmental Consulting, L.P.		
Permit Writer:	Corbet Mathis	Permit Writer Email address:	corbet.mathis@la.gov		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permits Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – *DO NOT COMPLETE THIS SECTION*. This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)	
Header throughout most of permit	PLAQUEMINES PARISH is misspelled. Should be PLAQUEMINES rather than PLAQUUMINES.	Change Made.	
Air Permit Briefing Sheet – II Origin	ConocoPhillips also submitted a Request for Addendum to the Renewal of Part 70 Operating Permit No. 2840-V1 dated November 26, 2008.	Change Made.	
Air Permit Briefing Sheet – III Description	The action requested in the above mentioned Addendum to the Renewal of Part 70 Operating Permit No. 2840-V1 dated November 26, 2008 needs to be included in the proposed changes. It should read: “Incorporate modifications from the addendum dated November 26, 2008, into this permit. The changes include updating combustion emission speciation based on factors from API publication 348.”	Change Made.	

Air Permit Briefing Sheet – III Description	#2 of the proposed changes needs to be changed. The max firing rate of the 294-H-1 Low Sulfur Gasoline Feed Heater No. 1 was incorrectly listed as 120 MMBtu/hr instead of the requested 138.12 MMBtu/hr in the initial permit application submitted in 2003 and subsequently approved by LDEQ. This is a typographical error in the current permit # 2840-V1 that needs to be corrected to 138.12 MMBtu/hr.	The max firing rate was changed to 138.12 MMBTU/hr. I don't understand the request.
Air Permit Briefing Sheet – III Description	The Renewal modification is also requesting to remove the applicability of 294-H-1 to 40 CFR 63 Subpart DDDDD per the state's direction.	The Subpart DDDDD regulations were already removed. I added a bullet as per your request.
Air Permit Briefing Sheet – III Description	The VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs) in TPV: After column need to be updated to reflect the changes in the above mentioned Addendum to the Renewal of Part 70 Operating Permit No. 2840-V1 dated November 26, 2008.	Change Made.
Air Permit Briefing Sheet – VIII. General Condition XVII Activities	GC-3 should be Annual Frequency GC-4 should be Annual Frequency GC-3 should be 0.01 tpy of VOC	It is more feasible that there are more than one lab event and pump maintenance event per year. Kept the same schedule as previous permit.
Air Permit Briefing Sheet – IX. Insignificant Activities	Regal R+O 150 Chemical Tank citation should be LAC 33:III.501.B.5.A.3	Change Made.
Regulatory Table 1	Source ID: UNF 2 should be marked as applicable to LAC 33:III.Chapter 13.	For what regulation? No change made.
Regulatory Table 1	Source ID: EQT 17 should be marked as "2" rather than "1" for 40 CFR 61 Subpart FF.	FF applies so a "1" is appropriate.
Section XI. Explanation from Exemption Status or Non-Applicability or a Source	Source ID: EQT17 should be shown exemption status from Chapter 15.	Recordkeeping applies, not exempt from Ch 15.
General Information	Why do we have "NOT IN CDS Alliance Refunit 301 Boilers" in all permits	If any changes are required to the General Information or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov
Inventories	Source ID: EQT 17 needs to show the discharge area as 20.75 square feet.	Change made.
Emissions Rates For TAP/HAP & other pollutants	Source IDs: EQT 17 and UNF 2 emissions need to be updated to reflect the Addendum to the Renewal of Part 70 Operating Permit No. 2840-V1 dated November 26, 2008.	Change made.
Specific Requirements	Source ID: FUG 4 should have requirements for 40 CFR 60 Subpart QQQ.	Change Made.
Specific Requirement #130	Do not need to capitalize the following statement: "If they can be measured and can be reliably quantified using good engineering practices"	There is a need since the objective is to emphasize the statement.

Specific Requirements	Source ID: EQT 17 should have requirements for Chapter 51.	Could you be more specific?
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